

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMERICAN STEAMSHIP OWNERS MUTUAL
PROTECTION AND INDEMNITY ASSOCIATION,
INC.,

04 Civ. 04309 (LAK)

Plaintiff,

-against-

ALCOA STEAMSHIP CO., INC. And Other Entities
Listed On Exhibit A Attached to the Second Amended
Complaint,

Defendants.

**DEFENDANT BESSEMER SECURITIES CORPORATION AS
SUCCESSOR TO GROSVENOR-DALE CO., INC. DISCLOSURES
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure ("FRCP") and the Local Rules of this Court, defendant Bessemer Securities Corporation as successor to Grosvenor-Dale Co., Inc. ("Bessemer") makes the following initial disclosures:

A. Individuals Likely to Have Discoverable Information

Bessemer believes that the following individuals may have discoverable information relevant to the claims and defenses asserted in this action: officers, employees and agents of plaintiff American Steamship Owners Mutual Protection and Indemnity Association, Inc. ("American Steamship") and all of the named defendants.

Bessemer reserves the right to supplement this disclosure of individuals likely to have discoverable information upon discovery of additional information subject thereto.

B. Relevant Documents

Bessemer is currently unaware of any documents in its possession, custody, or control which it may use to support the claims or defenses asserted in this action.

Bessemer reserves the right to supplement this disclosure of documents upon discovery of additional documents subject thereto.

C. Damages

Bessemer has not alleged any claim for damages.

Bessemer reserves the right to supplement this disclosure of damages upon discovery of additional information subject hereto.

D. Insurance

American Steamship may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.

January 10, 2005

CHADBOURNE & PARKE LLP

By /s/Donald I. Strauber
Donald I Strauber (DS-9256)
A Member of the Firm
Attorneys for Bessemer Securities
Corporation as successor to Grosvenor-
Dale Co., Inc.
30 Rockefeller Plaza
New York, New York 10112
(212) 408-5100